

United States District Court

JAN 17 2012

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

McAllen Division

David J. Bradley, Clerk

V.

CRIMINAL COMPLAINT

Case Number: M-12-0100 -M

Maria Concepcion RODRIGUEZ

A95 329 702

YOB: 1969

COC: Mexico

Name and Address of Defendant

I the undersigned complainant, state the following is true and correct to the best of my knowledge and belief. On or about January 13, 2012 in Hidalgo County, in the Southern District of Texas defendant(s) did,

knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, transports, or moves or attempts to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law and brought the alien for the purpose of commercial advantage or private gain,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) & 1324(a)(2)(B)(ii)
I further state that I am a(n) Customs and Border Protection Officer and that this complaint is based on the following facts:

See Attachment A

Continued on the attached sheet and made a part of this complaint:
Sworn to before me and subscribed in my presence,

☒ Yes

☐ No

Approved By: **J. Honeycutt**

January 15, 2012

4:01 pm at

Date

Peter E. Ormsby

U.S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Complainant

Juan R. Cienega

Printed Name of Complainant

McAllen, Texas

City and State

Signature of Judicial Officer

12-0100-M

Attachment A

The defendant, a Resident Alien of the United States and driver of the vehicle, attempted to bring illegally into the United States through the Anzalduas Port of Entry alien child C.H.M. (female, 8 years old), a Mexican Citizen, as a United States Citizen. At primary, the defendant claimed the child as her daughter, that she was a United States Citizen, and presented a Dallas, Texas Birth Certificate bearing the name S.R. as proof. The defendant and the child were referred into secondary for further inspection due to the child not being able to answer routine questions.

In secondary, further inspection revealed the defendant was utilizing her daughter's birth certificate to bring C.H.M. into the United States illegally. She went on to state she knew C.H.M. did not have any legal status to enter the United States. The defendant admitted she was going to be paid \$2000 dollars upon C.H.M.'s safe arrival in Dallas, where C.H.M.'s mother resides.

C.H.M. was able to provide her mother's identity (Reyna HERNANDEZ-Mireles) and contact information. Mrs. HERNANDEZ-Mireles was contacted and corroborated the defendant's story. She stated they knew each other, as they had been neighbors in the past. She stated she had approached the defendant regarding assistance in bringing C.H.M. into the United States. For her services, the defendant had been paid \$1500 dollars initially, and the remaining balance (\$2000 dollars) was to be paid once C.H.M. arrived in Dallas. Mrs. HERNANDEZ-Mireles advised she would travel to Hidalgo as soon as possible to reunite with her daughter. C.H.M. was transported to the International Educational Services for temporary housing.

The next day, Mrs. HERNANDEZ-Mireles arrived at the Hidalgo Port of Entry. Database queries on Mrs. HERNANDEZ-Mireles and C.H.M. revealed no legal status in the United States. C.H.M. was transported back to the Hidalgo Port of Entry, where both, mother and daughter were returned to Mexico.